

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

.....
IN RE:

CASE NO. 5-20-03429-RNO

**NEIL THEODORE RUSSO AKA
NEIL RUSSO AKA NEIL T. RUSSO,
YVONNE NICHELLE RUSSO AKA
YVONNE N. RUSSO AKA
YVONNE RUSSO,**

DEBTORS.
.....

**CHAPTER 7 TRUSTEE'S APPLICATION TO EMPLOY
THE LAW OFFICES OF MARK J. CONWAY, P.C. AS COUNSEL**

The application of Mark J. Conway ("Trustee") respectfully represents:

1. The Trustee is the duly appointed and acting Chapter 7 Trustee in the above-captioned matter.

2. The Trustee wishes to employ the Law Offices of Mark J. Conway, P.C. to represent the Trustee in this matter. The Trustee has selected the Law Offices of Mark J. Conway, P.C. for the reason that the Law Offices of Mark J. Conway, P.C. has considerable experience in bankruptcy matters, and he believes that the Law Offices of Mark J. Conway, P.C. is well qualified to represent him in this proceeding and such representation is in the best interest of the Estate.

3. The professional services that the Law Offices of Mark J. Conway, P.C. shall render are, among others, the following:

- (a) to represent the Trustee relating to the ownership and sale of certain property owned by the Estate; and
- (b) to handle any and all legal issues which may arise during the course of the administration of the Estate.

4. The Law Offices of Mark J. Conway, P.C. shall be compensated at its normal rates (Mark J. Conway \$300.00 per hour and paralegals \$60-110 per hour), plus reimbursement of its costs and expenses.

5. To the best of the Trustee's knowledge, the Law Offices of Mark J. Conway, P.C. and its staff have no connection with the debtor, creditors or any other party in interest, and represents no interest adverse to the Trustee of the Estate in matters upon which he is to be engaged, and its employment would be in the best interest of the Estate. The Trustee, Mark J. Conway, is an attorney in the Law Offices of Mark J. Conway, P.C..

WHEREFORE, the Trustee prays that he be authorized to employ the Law Offices of Mark J. Conway, P.C. as his attorney under a general retainer.

Respectfully submitted by:

/s/ Mark J. Conway
MARK J. CONWAY, ESQUIRE
502 South Blakely Street
Dunmore, PA 18512
(570) 343-5350

Chapter 7 Trustee

DATED: January 25, 2021

**IN THE UNITED STATES BANKRUPTCY COURT
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CASE NO. 5-20-03429-RNO

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YVONNE N. RUSSO AKA
YVONNE RUSSO,**

DEBTORS.
.....

DECLARATION OF PROPOSED ATTORNEY

I, Mark J. Conway, Esquire hereby certify as follows:

1. I am an attorney admitted to practice in the Commonwealth of Pennsylvania and in the United States Bankruptcy Court for the Middle District of Pennsylvania.

2. I am an attorney employed by the Law Offices of Mark J. Conway, P.C., a law firm having an address of 502 South Blakely Street, Dunmore, PA 18512

3. To the best of my information and belief, the Law Offices of Mark J. Conway, P.C. has no connection with the debtors, their creditors or any other party in interest herein, or its respective attorneys.

4. The Law Offices of Mark J. Conway, P.C. does not have any interest adverse to the Debtors or the Estate in matters upon which the Law Offices of Mark J. Conway, P.C. is to be engaged.

5. The Law Offices of Mark J. Conway, P.C. is a disinterested person within the meaning of Section 101(14) of the Bankruptcy Code. Affiant is also the Chapter 7 Trustee in this case.

6. I declare under penalty of perjury that the information provided herein is true and correct.

LAW OFFICES OF MARK J. CONWAY, P.C.

/s/ Mark J. Conway
MARK J. CONWAY, ESQUIRE
502 South Blakely Street
Dunmore, PA 18512
(570) 343-5350

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YVONNE NICHELLE RUSSO AKA	:	
YVONNE N. RUSSO AKA	:	
YVONNE RUSSO,	:	
	:	
DEBTORS.	:	
	:	

CERTIFICATE OF SERVICE

I, Constance Norvilas, Paralegal, hereby certify that on this 25th day of January, 2021, I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail addressed:

U.S. Trustee
Middle District of PA
228 Walnut Street
Room 1190
Harrisburg, PA 17101
ustpreion03.ha.ecf@usdoj.gov

LAW OFFICES OF MARK J. CONWAY, P.C.

/s/ Constance Norvilas
Constance Norvilas, Paralegal
502 South Blakely Street
Dunmore, PA 18512
(570) 343-5350